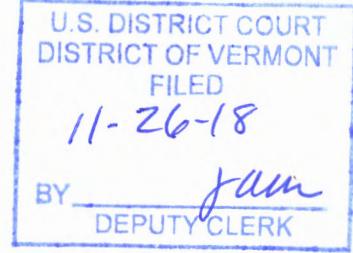


UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT



UNITED STATES OF AMERICA  
v.

Docket No. 2:15-cr-00038

ANTHONY "KAPONE" SMITH,  
Defendant.

**SUPERSEDING INFORMATION**

The United States Attorney charges:

**COUNT 1**

In or about June 2014, in the District of Vermont and elsewhere, ANTHONY SMITH traveled in interstate commerce from the State of New York to the State of Vermont, with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment or carrying on of an unlawful activity, that is, a business enterprise involving prostitution offenses in violation of the laws of Vermont, including 13 V.S.A. § 2637(a)(2), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(18 U.S.C. § 1952(a)(3))

COUNT 2

Between in or about November and December 2014, in the District of Vermont and elsewhere, ANTHONY SMITH traveled in interstate commerce from the State of New York to the State of Vermont, with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment or carrying on of an unlawful activity, that is, a business enterprise involving prostitution offenses in violation of the laws of Vermont, including 13 V.S.A. § 2637(a)(2), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(18 U.S.C. § 1952(a)(3))

Christina E. Nolan  
CHRISTINA E. NOLAN (by ACG)  
United States Attorney  
Burlington, Vermont  
November 26, 2018